



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION IV
612 EAST LAMAR BLVD, SUITE 400
ARLINGTON, TEXAS 76011-4125

March 4, 2011

Brian J. O'Grady, Vice President-Nuclear
And Chief Nuclear Officer
Nebraska Public Power – Cooper
Nuclear Station
72676 648A Avenue
Brownville, NE 68321

SUBJECT: ANNUAL ASSESSMENT LETTER FOR COOPER NUCLEAR STATION
(REPORT 05000298/2011001)

Dear Mr. O'Grady:

On February 3, 2011, the NRC completed its end-of-cycle performance review of Cooper Nuclear Station. The NRC reviewed the most recent quarterly performance indicators (PIs) in addition to inspection results and enforcement actions from January 1, 2010, through December 31, 2010. This letter informs you of the NRC's assessment of your facility during this period and its plans for future inspections at your facility. This performance review and enclosed inspection plan do not include security information. A separate letter will include the NRC's assessment of your performance in the Security Cornerstone and its security-related inspection plan.

The NRC determined that overall, Cooper Nuclear Station operated in a manner that preserved public health and safety and met all cornerstone objectives. The NRC determined the performance at Cooper Nuclear Station during the most recent quarter was within the Licensee Response Column of the NRC's Reactor Oversight Process (ROP) Action Matrix because all inspection findings had very low (i.e., green) safety significance, and all PIs indicated that your performance was within the nominal, expected range (i.e., green). Therefore, the NRC plans to conduct ROP baseline inspections at your facility.

The NRC identifies substantive crosscutting issues to communicate a concern with the licensee's performance in a crosscutting area and to encourage the licensee to take appropriate actions before more significant performance issues emerge.

In our 2009 mid-cycle assessment letter, dated September 1, 2009, the NRC staff identified a crosscutting theme associated with the decision-making component of the human performance area involving the use of conservative decision-making [H.1(b)]. At the time, the NRC did not identify a substantive crosscutting issue because you had appropriately recognized this theme and had implemented a range of corrective actions to address it. The 2009 end-of-cycle letter dated March 1, 2010, continued this theme but still did not identify a substantive crosscutting

issue, primarily because no findings with this common theme had been identified since the full implementation of your corrective actions.

However, six findings related to the use of conservative assumptions in decision-making have occurred during this assessment period, all occurring following full implementation of your corrective actions. These findings occurred in the Initiating Events and Mitigating Systems cornerstones. Examples included errors which led to an ice deflector pontoon barge being stored in the service water discharge canal, failing to monitor the performance of Agastat relays to ensure appropriate corrective actions were implemented, failing to ensure an adverse condition associated with safety-related station batteries was promptly corrected, and failing to properly assess and manage the risk associated with maintenance in the switchyard.

The NRC has determined that twice during the last half of the assessment period you initiated corrective action documents that acknowledged this theme. However neither of those corrective action documents resulted in you implementing adequate corrective actions to mitigate this theme. Your action has prompted an NRC concern with your scope of effort and progress in addressing this crosscutting theme. Therefore, because a crosscutting theme associated with the use of conservative assumptions in decision-making exists and because the NRC has concerns with your scope of effort and progress in addressing this common theme, the NRC has identified a substantive crosscutting issue in the human performance area associated with the decision-making component related to the use of conservative assumptions in decision-making [H.1(b)]. The NRC will close this substantive crosscutting issue when you demonstrate sustainable performance improvements as evidenced by effective implementation of an appropriate corrective action plan that results in no safety significant inspection findings and a notable reduction in the overall number of inspection findings with the same common theme. The NRC plans to perform focused baseline inspections for this theme in 2011 after you notify us in writing of your readiness for inspection.

In our end-of-cycle performance assessment letter dated March 3, 2010, a substantive crosscutting issue in the area of human performance was identified based on a number of findings associated with the work practices component related to the use of human error prevention techniques [H.4(a)]. We indicated that the crosscutting issue would remain open until you demonstrated sustainable performance improvements as evidenced by effective implementation of an appropriate corrective action plan that resulted in no safety significant inspection findings and a notable reduction in the overall number of inspection findings with the same common theme. In our mid-cycle letter dated September 1, 2010, we noted that there was a reduction in the number of inspection findings with the same common theme, however the substantive crosscutting issue remained open since you had not completed all actions documented in your improvement plan. During this assessment period, we noted that you had completed all aspects of your corrective action plan, no safety significant findings were identified, and only one inspection finding with the crosscutting aspect was identified. On the basis of these results, the NRC is closing this substantive crosscutting issue.

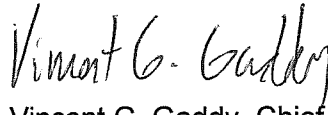
The enclosed inspection plan lists the inspections scheduled through June 30, 2012. Routine inspections performed by resident inspectors are not included in the inspection plan. The inspections listed during the last nine months of the inspection plan are tentative and may be revised at the mid-cycle performance review. The NRC provides the inspection plan to allow for the resolution of any scheduling conflicts and personnel availability issues. The NRC will contact you as soon as possible to discuss changes to the inspection plan should circumstances warrant any changes. Temporary Instruction 2515/177 Inspection, "Managing Gas Accumulation in Emergency Core Cooling, Decay Heat Removal, and Containment

Spray Systems," which remains to be scheduled, will be completed during the 2011 and 2012 calendar year. Regional personnel will contact you to establish an appropriate time for this activity.

In accordance with 10 CFR 2.390 of the NRC's "Rules of Practice," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records (PARS) component of NRC's document system (ADAMS). ADAMS is accessible from the NRC Web site at <http://www.nrc.gov/reading-rm/adams.html> (the Public Electronic Reading Room).

Please contact me at 817-860-8144 with any questions you have regarding this letter.

Sincerely,

A handwritten signature in black ink that reads "Vincent G. Gaddy". The signature is written in a cursive style with a large, stylized "V" and "G".

Vincent G. Gaddy, Chief
Reactor Projects Branch C

Docket: 50-298
License: DRP-46

Enclosure: Cooper Inspection/Activity Plan

cc: Distribution via ListServ

02/28/2011 06:54:59

Report 22

Cooper

Inspection / Activity Plan

03/01/2011 - 06/30/2012

Unit Number	Planned Dates Start End	Inspection Activity	Title	No. of Staff on Site
		EXAM - INITIAL OPERATOR EXAM		3
1	02/28/2011 03/04/2011	X02465	INITIAL EXAM - CNS (02/2011)	
1	06/06/2011 06/10/2011	X02465	INITIAL EXAM - CNS (02/2011)	
		RS123 - RADIATION SAFETY		2
1	03/21/2011 03/25/2011	IP 71124.01	Radiological Hazard Assessment and Exposure Controls	
1	03/21/2011 03/25/2011	IP 71124.02	Occupational ALARA Planning and Controls	
1	03/21/2011 03/25/2011	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
1	03/21/2011 03/25/2011	IP 71151-OR01	Occupational Exposure Control Effectiveness	
1	03/21/2011 03/25/2011	IP 71151-PR01	RETS/ODCM Radiological Effluent	
		PSB2-08G - INSERVICE INSPECTION		1
1	03/28/2011 04/04/2011	IP 7111108G	Inservice Inspection Activities - BWR	
		EP1 - BIENNIAL EP PROGRAM INSPECTION		1
1	06/20/2011 06/24/2011	IP 7111402	Alert and Notification System Testing	
1	06/20/2011 06/24/2011	IP 7111403	Emergency Preparedness Organization Staffing and Augmentation System	
1	06/20/2011 06/24/2011	IP 7111404	Emergency Action Level and Emergency Plan Changes	
1	06/20/2011 06/24/2011	IP 7111405	Correction of Emergency Preparedness Weaknesses and Deficiencies	
1	06/20/2011 06/24/2011	IP 71151	Performance Indicator Verification	
		TSB-52B - BIENNIAL PI&R		4
1	06/06/2011 06/10/2011	IP 71152B	Identification and Resolution of Problems	
1	06/20/2011 06/24/2011	IP 71152B	Identification and Resolution of Problems	
		RP678 - RADIATION SAFETY TEAM		3
1	06/13/2011 06/17/2011	IP 71124.06	Radioactive Gaseous and Liquid Effluent Treatment	
1	06/13/2011 06/17/2011	IP 71124.07	Radiological Environmental Monitoring Program	
1	06/13/2011 06/17/2011	IP 71124.08	Radioactive Solid Waste Processing and Radioactive Material Handling, Storage, and Transportation	
		EB1-21 - COMPONENT DESIGN BASIS INSPECTION		4
1	01/30/2012 03/02/2012	IP 7111121	Component Design Bases Inspection	
1	01/30/2012 03/02/2012	IP 7111121-DesMargn	Risk-significant/low Design Margin Components	
1	01/30/2012 03/02/2012	IP 7111121-OpAction	High Risk Operator Actions	
1	01/30/2012 03/02/2012	IP 7111121-OpIssues	Operating Experience Issues	
		RS34 - RADIATION SAFETY		2
1	04/02/2012 04/06/2012	IP 71124.03	In-Plant Airborne Radioactivity Control and Mitigation	
1	04/02/2012 04/06/2012	IP 71124.04	Occupational Dose Assessment	
		EB1-07T - HEAT SINK PERFORMANCE		1
1	05/14/2012 05/18/2012	IP 7111107T	Heat Sink Performance	

This report does not include INPO and OUTAGE activities.

This report shows only on-site and announced inspection procedures.